

**Summary of April 14, 2000**  
**Indiana Department of Environmental Management (IDEM) and**  
**Clean Manufacturing Technology and Safe Materials Institute (CMTI)**  
**Meeting with Metal Finishers and POTWs Participating in**  
**Metal Finishing Strategic Goals Program**

The meeting was called to order at 1:05 p.m. by facilitator Kathy Watson. The facilitator welcomed meeting participants and summarized the main meeting agenda items - national and regional updates; and workgroup progress reports and updates to Indiana's SGP implementation plan. The current SGP mailing list was circulated so meeting participants could indicate their attendance and update address, phone, fax and e-mail address information as needed.

**OPENING REMARKS FROM IDEM**

After introductions by those in attendance (**meeting roster attached**), IDEM Deputy Commissioner Tim Method provided opening remarks. Mr. Method reiterated IDEM's commitment to the Strategic Goals Program and thanked meeting attendees for their efforts and commitment as well. Mr. Method also recognized recent SGP signees. SGP participant wall plaques were presented to representatives for:

Best Access Systems (Indianapolis), C & R Plating (Columbia City), Certified Metal Finishers (Muncie), Indiana Automotive Fasteners (Greenfield), Wayne Metal Protection Company (Ft. Wayne), and LaPorte Wastewater Treatment Plant.

**NATIONAL/REGIONAL UPDATES**

**Matt Gluckman, EPA Region 5 Pretreatment Coordinator and SGP Lead**

1. Revisions to Federal General Pretreatment Rules - Matt reported that a large number of public comments were received on the general pretreatment rules proposed in July 1999. Although it may take longer to finalize the rulemaking, the rule will move forward due to the amount of interest.
2. Delegation of Pretreatment Program to Indiana - copy of preliminary adopted rules available from Bill Blue/IDEM. IDEM currently preparing delegation request package to be sent to EPA Region 5. Delegation of program to Indiana expected by the end of the year.
3. Upcoming SUR-FIN Conference and 2<sup>nd</sup> Annual SGP Summit - to be held in Chicago June 26 and 27. Will be discussing benefits verification and other issues affecting various stakeholder groups. In addition, will also be discussing what happens to the SGP after 2002.
4. Change in National Industry Contact - new contractor coming on board that will be replacing Bob McDowell. Until contractor hired, industry contact is Christian Richter, a metal finishing industry lobbyist. To-date, 385 facilities have signed on nationwide; and interest in the program seems to be growing again. The membership goal for January 2001 is 600 metal finishing facilities.
5. Focusing now on gathering/evaluating various facility case studies; using baseline performance database information.
6. Metal Products and Machinery (MP & M) meeting - EPA project officers and others came to Chicago on April 11 for public meeting on the upcoming rulemaking. Several metal finishers and POTWs attended the Chicago meeting. Similar meeting previously held in Washington, DC, but few metal finishers came, audience was mainly made up of lobbyists and trade association representatives. EPA HQ staff provided presentation on EPA's status in developing proposed rules, with a question/answer session and comments from meeting participants. Copies of the overheads from those meetings were distributed. Anticipate new rules would be final in 2002.

Larger facilities would become subject to MP & M requirements (based on flow cutoffs). EPA still leaning towards establishing mass limits. Some ideas from pretreatment streamlining rules may make it into MP & M rule (e.g., not have to monitor for pollutants not present).

7. EPA thinking about how to recognize and incorporate SGP and pollution prevention into this rulemaking. EPA website will soon have information about the status of this proposed rulemaking.

### **Mark Sutton, H.H. Sumco, Member National Industry Steering Committee**

1. Mark reported that at the annual American Electroplaters and Surface Finishing Society's annual meeting in January, AESF and EPA recognized participants of the Indiana Strategic Goals Program with a wall plaque for launching the first local SGP. The plaque was circulated for meeting participants to view. Mark also commented that the conference was great, with a substantial amount of pollution prevention information disseminated.
2. Mark announced that AESF and the Surface Finishing Industry Society have approved the Coventry Group to lead national industry SGP efforts. The national steering committee will be meeting with the new contractor prior to the SUR-FIN/SGP Summit in June. The Coventry Group will be more active in the rulemaking process, more open to the states, and provide greater assistance in planning and guidance.
3. Dr. Corson commented on the need to recruit metal finishers located in Northwest Indiana, and wondered if the Chicago-area SGP group could assist in any way, particularly on technical assistance issues.

### **INDIVIDUAL WORKGROUP REPORTS**

#### **RCRA Issues Workgroup**

Workgroup co-leads Gary Romesser of IDEM-RCRA and Mark Sutton of H.H. Sumco presented an update on major items under review by the RCRA workgroup as follows:

1. Made presentation at annual P2 Conference for Electroplaters at Purdue on March 15.  
Gary made available copies of the issue paper presented at the conference.
2. Model Draft Format for Variance Request - Mark reported that the request on behalf of Sumco is almost complete. The workgroup has encountered regulatory barriers, in that the company would need to receive a variance from each state in which their waste was passing through on its way to final recycling, as well as from the receiving facility's state. In Illinois, the process is the equivalent of going to environmental court, and a final decision takes about a year.
3. State-to-State Reciprocity - EPA HQ has indicated this is a huge problem they cannot resolve in the near future, as state activities cannot extend beyond state borders (per current RCRA regulations). Multi-state workgroup (of 47 states) is currently discussing and has determined a RCRA variance would be needed from each state in which the waste passes. Industry is hopeful the Coventry Group may be able to assist.
4. Database for Recycling Facilities - being compiled nationally now. Thus far, EPA Headquarters has developed an updated list of facilities accepting F006 containing zinc.
5. National Taskforce on F006 Benchmark Study  
The taskforce was formed to consider viable options to encourage reclamation of the high-metal sludges and make recommendations to the Metal Finishing Subcommittee and to EPA. Current feedback indicates they will most likely recommend an exemption be granted for used ion exchange canisters. They also are looking at developing guidance for streamlining variance requests.
6. IDEM's request for RCRA delisting authorization from EPA on public comment now - anticipate final approval by June 2000.
7. A final Federal Rule to "Increase Accumulation Time to 180 days (or 270 days under certain conditions) for F006 being reclaimed by "Large Quantity Generators" became effective 3/8/00. A draft NPD (Non-Rule Policy Document) for enforcement discretion of use of this regulation is under review by IDEM staff. Per this NPD, IDEM inspectors will not seek penalties for violations of the current state rule (90-day accumulation) for the time period required to adopt this new rule.

#### **Performance Ladder/5-Star Workgroup**

1. Cheri Storms distributed a performance ladder draft proposal (attached) which incorporates both state recognition through a 5-Star environmental recognition program and the national SGP model.
2. Next workgroup meeting tentatively scheduled for May 10 at IDEM - OPPTA office. All interested persons are invited to participate in this workgroup.
3. Dr. Corson noted that he had sent a letter to IDEM listing potential incentives to SGP members. As the performance ladder workgroup is the appropriate group to consider these ideas, the list will be shared with Cheri Storms and other workgroup participants.

## **Technical and Financial Assistance**

Shayla Barrett of CMTI provided the following updates:

1. Hands-on Technical Assistance - national P2 consultant interested in coming to Indiana to assist SGP metal finishers in methods to reduce their dragout, particularly in facilities using racks. Training includes use of in-house videotaping of employees performing this metal finishing work. Similar sessions in other facilities have shown some impressive results in reducing dragout emissions. Shayla asked for any interested volunteers. CMTI has conducted similar training for the wood furniture sector.
2. Annual SGP report cards have been mailed to SGP metal finishers by the national group. CMTI will provide assistance to interested metal finishers on one or more specific goals.
3. CMTI will be sending funding proposal to the Indiana Dept. of Commerce within the next two weeks for Strategic Development Funds. The funding proposal will be for \$90,000 to \$110,000 in grant dollars, with a 50% in-kind match required (e.g., personnel, space, training materials).

Program is similar to "Training 2000 Grant," that Indiana Automotive Fasteners has received in the past. "Training 2000" is for business retention/attraction, it is a universal state program for new employees retraining to your facility, etc. CMTI can also assist metal finishers in seeking Training 2000 funding.

Dr. Corson asked whether there was a need for developing training materials/course offerings in Spanish.

## **Recruitment**

1. Jerry Phillips of Finishing Concepts reported that the SGP booth was displayed at the Electroplaters P2 conference at Purdue on March 15. Booth includes display board made up with the SGP promotional posters, poster with signees names, and IDEM's promotional brochure. Booth will also be displayed at the annual Indiana Industrial Operator's Association meeting on April 27.
2. CMTI met with Elkhart and South Bend metal finishers in February to promote the SGP. Carol McDowell (McDowell Enterprises) and Nancy Norton (Imagineering) were on hand to provide testimonials on their involvement with the program. Several metal finishers attended and seemed interested.
3. Meeting participants also thanked Jerry for his tireless efforts in promoting the SGP, including authoring articles in AESF and IIOA publications. His efforts are greatly appreciated.

## **POTW**

1. Sue Claussen reported that the LaPorte and South Bend POTWs have recently officially signed on to the SGP.
2. Lynn Newvine is the new pretreatment coordinator for City of Elkhart and will continue Elkhart's commitment to the program. The workgroup will be working with Lynn to bring her up-to-date on the SGP and implementation plan.
3. Commented that preliminary adoption of the rule for pretreatment delegation to the state is a positive step.
4. Representatives from City of Michigan City attended recent MP & M meeting held in Chicago. Sue feels there will be more interest in the SGP once the MP & M rule is proposed in October. Also noted that the SGP is referenced 4-5 times in the introduction section of document concerning upcoming rulemaking.

## **OPEN FORUM FOR METAL FINISHERS**

Facilitator offered time for metal finishers to share information on their recent experiences.

### **Major Fire at Certified Metal Finishers:**

Lynn Poppe of Certified Metal Finishers shared information about the recent major fire at their metal finishing facility which destroyed about one third of their plant. On the positive side, the company now has the opportunity to rebuild "better", with newer, more efficient equipment and pollution prevention, and perhaps complete automation.

It was noted that during the local emergency response, minimal waste or fire water was flushed to the city sewers, as Certified did a good job of containing it. Due to the unfortunate experience at Certified, meeting participants discussed the possibility of Certified sharing a more detailed account of their experiences with the metal finishing community - what worked well, and in hindsight, what they wished would have worked better. It was noted that one thing that worked well was that the fire department had information about what was stored within their building. It was suggested that a sixth ad hoc workgroup be formed to develop a case study paper concerning this incident, and an

emergency preparedness guidance document for metal finishers. Dr. Corson volunteered to lead the workgroup, with Mark Sutton, Brad Crowe and Allen Mayo expressing their desire to serve on the workgroup. Ms. Poppe indicated she would have to check with company management to see if case-specific details could be shared with the public.

#### **Best Access:**

Dave Benshoof commented that Best Access is proud to be an official participant in the SGP. He also indicated interest in working with CMTI to pursue the videotape training of facility employees on more efficient P2 and dragout procedures.

#### **Indiana Automotive Fasteners:**

Brad Crowe commented it was good to see Indiana moving forward in implementing our local program and receiving national recognition. He also inquired as to whether there was a photograph of representatives from the state receiving the award at the January AESF conference.

#### **Baycote Metal Finishing**

Jeff Petkovich raised a concern about a potential change in the classification of their wastewater treatment plant (from Class C to Class D) as the result of process changes made to reduce the amount of hazardous waste generated at their facility. The issue was raised since this may be a state barrier to the SGP, a disincentive to minimizing waste generated during the wastewater treatment process. Apparently the Mishawaka POTW has interpreted the state rule to indicate the plant would now require a Class D certified operator. Mr. Petkovich indicated he was waiting a return call from Christine Hightower of IDEM. Mr. Method responded that he and Debbie Dubenetzky would be contacting Ms. Hightower and looking into the matter.

#### **National Association of Metal Finishers (NAMF)**

Brendan Clemens of Wayne Metal Protection and NAMF, announced that NAMF will be meeting May 15 at the 500 Track in Indianapolis. At the meeting, NAMF will be discussing where the local branch is going and what they want to accomplish. Mr. Clemens also offered NAMF's assistance in developing the emergency preparedness guidance document.

#### **Clean Manufacturing Technology and Safe Materials Institute (CMTI)**

Shayla Barrett commented that the second issue of the Indiana SGP newsletter was recently mailed.

#### **NEXT STEPS**

Next steps offered by Kathy Watson and agreed to by meeting participants:

1. Does current meeting format work well for everyone? Response - YES.
2. IDEM to update and distribute the Indiana SGP implementation plan working draft document. **A copy of the updated implementation plan draft is attached.**
3. Workgroups should continue to meet over the coming weeks.
4. Next full stakeholder group meeting to be held on Thursday, July 20 from 1:00 to 3:00 p.m. Indianapolis time at the Marion County Extension Office (today's location). Specific agenda items to include any issues that arise in implementing the implementation plan and developing the performance ladder. Discussion can focus on strategies to overcome the implementation barriers encountered. Workgroup leads should keep Debbie Dubenetzky apprized of their activities and any problematic issues that arise.

The facilitator adjourned the meeting at 3:00 p.m.

**Attachments:** Performance Ladder Proposal  
Indiana SGP Implementation Plan for 1999-2000 - Revised 5/17/00